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Attorneys for The Trustees of Princeton University, a not-for-profit educational corp. of the State of New Jersey (incorrectly referenced in the Complaint as "Princeton University"), Michele Minter, Regan Hunt Crotty, Joyce Chen Shueh, Walter Wright, Cole M. Crittenden, Kathleen Deignan, W. Rochelle Calhoun, Jill S. Dolan, and Sarah-Jane Leslie

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JOHN DOE,

Plaintiff,

v.

PRINCETON UNIVERSITY, et
al.,

Defendants.

Civil Action No. 3:19-cv-07853 BRM-TJB

**STIPULATION TO EXTEND
ANSWER DEADLINE AND
PROPOSED ORDER**

Stipulation to Extend Answer Deadline and Proposed Order

Defendant the Trustees of Princeton University¹ (“Princeton” or “the University”) and Plaintiff John Doe hereby stipulate to extend the time for Princeton to file its Answer to the Amended Complaint until 14 days after the Court rules on Defendants’ forthcoming Renewed Motion to Dismiss the Title IX claims. The reasons for this Stipulation are:

1. On December 16, 2020, the Court granted in part and denied in part Princeton’s Motion to Dismiss the State Law Claims, ECF No. 55, which triggered Defendant’s obligation to Answer the Amended Complaint. *See* FRCP 12(a)(4).

2. On December 17, 2020, the Court granted Plaintiffs’ Motion to Reconsider the Court’s prior dismissal of Plaintiff’s Title IX claims and vacated that dismissal. ECF Nos. 56-57. On December 18, Princeton moved to clarify that grant of reconsideration, asking the Court to address whether the University could submit supplemental briefing in support of its prior Motion to Dismiss the Title IX claims or a Renewed Motion to Dismiss the Title IX claims. ECF No. 58.

3. Given the uncertainty as to whether such briefing would proceed, the parties stipulated to extend the time to Answer the Amended Complaint to the later of February 2, 2021, or 14 days after the Court acted on the Motion for Clarification. ECF

¹ The only claim against the individual Defendants named in the Amended Complaint was dismissed in the Court’s December 16, 2020 Order granting in part and denying in part Plaintiffs’ Motion to Dismiss the State Law Claims. *See* ECF No. 55 (dismissing Count 7, the negligence claim against the individual Defendants).

No. 59. The stipulation explained that, if Princeton were permitted to submit a Renewed Motion to Dismiss the Title IX claims or supplement its prior Motion to Dismiss, then it would not answer the parts of the Amended Complaint directed at those claims unless that Motion were denied. The magistrate judge assigned to this case entered that stipulation as an Order on December 28, 2020. ECF No. 60.

4. On January 21, 2021, this Court issued an Order clarifying that Princeton may submit a Renewed Motion to Dismiss the Title IX claims by February 5, 2021. ECF No. 62. Because the scope of Defendant's Answer will depend on the outcome of that motion, the parties agree that Defendant's time to answer should be extended to 14 days after the Court decides the Renewed Motion to Dismiss.

For the foregoing reasons, the parties hereby STIPULATE to extend the time to Answer the Amended Complaint until 14 days after this Court decides Princeton's forthcoming Renewed Motion to Dismiss the Title IX claims.

Submitted by:

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IT IS SO ORDERED.

Entered this _____ day of January, 2021

Judge